

Company Name _____

EPA ID# No. _____

Inspection Date _____

Part VI

Interim Status Treatment, Storage and Disposal Facility (TSDF)

(This Part does not apply to permitted facilities. For permitted facilities, complete Appendix C.)

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

1. Required Notices - 373-3.2(c)

- A. ___ The owner or operator of a facility that has arranged to receive hazardous waste from a foreign source must notify the Department in writing at least four (4) weeks in advance. (Notice of subsequent shipment of the same waste from the same source is not required) - 373-3.2(c)(1). _____
- B. ___ Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, the owner or operator notified the new owner or operator in writing of the requirements - 373-3.2(c)(2). _____

2. General Waste Analysis - 373-3.2(d)

- A. ___ Before treatment, storage, or disposal of any hazardous waste, the owner or operator obtained a detailed chemical and physical analysis of a representative sample of the waste. At a minimum, this analysis must contain all the information which must be known to treat, store, or dispose of the waste in accordance with the requirements of this Subpart and 6NYCRR Part 376 - 373-3.2(d)(1)(i). _____
- B. ___ The analysis included data developed under 6NYCRR Part 371 and existing published or documented data on the hazardous waste or on waste generated from similiar processes - 373-3.2(d)(1)(ii). _____
- C. ___ The analysis has been repeated as necessary to ensure that it is accurate and up-to-date - 373-3.2(d)(1)(iii). _____
- D. ___ The owner or operator of an off-site facility must inspect and, if necessary, analyze each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper - 373-3.2(d)(1)(iv). _____

- E. The owner or operator has developed and followed a written waste analysis plan - 373-3.2(d)(2).
- F. The owner or operator keeps this plan at the facility - 373-3.2(d)(2).
- G. The plan specifies, at a minimum:
1. The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters - 373-3.2(d)(2)(i).
 2. The test methods which will be used to test for these parameters - 373-3.2(d)(2)(ii).
 3. The sampling method which will be used to obtain a representative sample of the waste to be analyzed - 373-3.2(d)(2)(iii).
 4. The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date - 373-3.2(d)(2)(iv).
 5. For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply - 373-3.2(d)(2)(v).
 6. Where applicable, the methods which will be used to meet the additional waste analysis requirements for specific waste management methods as specified in Part 373-3 and 376.1(g) - 373-3.2(d)(2)(vi).
 7. For surface impoundments exempted from land disposal restrictions under 376.1(d)(1), the procedures and schedule for:
 - (a) the sampling of impoundment contents - 373-3.2(d)(2)(vii)(a).
 - (b) the analysis of test data - 373-3.2(d)(2)(vii)(b).
 - (c) the annual removal of residues which are not delisted and exhibit a characteristic of hazardous waste or which do not meet the treatment standards in 376.4 of this title - 373-3.2(d)(2)(vii)(c).
8. For owners and operators seeking an exemption to the air emission standards of section 373-3.29 of this Title in accordance with subdivision 373-3.29(d) of this Title:
- Yes No
- If Yes: No
- Yes No
- (a) If direct measurement is used for the waste determination, the procedures and schedules for waste sampling and analysis, and the

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X Violations

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results of the analysis of test data to verify the exemption - 373-3.2(d)(2)(viii)(a).

Yes

No

(b) ___ If knowledge of the waste is used for the waste determination, any information prepared by the facility owner or operator or by the generator of the hazardous waste, if the waste is received from off-site, that is used as the basis for knowledge of the waste - 373-3.2(d)(2)(viii)(b).

If No: Complete Appendix X

9. ___ For off-site facilities the waste analysis plan required must also specify the procedures which will be used to inspect and, if necessary, analyze each movement of hazardous waste received at the facility to ensure that it matches the identity of the waste designated on the accompanying manifest or shipping paper. The plan describes, at a minimum:

(a) ___ The procedures which will be used to determine the identity of each movement of waste managed at the facility - 373-3.2(d)(3)(i); and

(b) ___ The sampling method which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling - 373-3.2(d)(3)(ii).

(c) ___ The procedures that the owner or operator of an off-site landfill receiving containerized hazardous waste will use to determine whether a hazardous waste generator or treater has added a biodegradable sorbent to the waste in the container - 373-3.2(d)(3)(iii).

3. Security - 373-3.2(e)

A. The owner or operator must prevent the unknowing entry, and minimize the possibility for the unauthorized entry, of persons or livestock onto the active portion of his facility, because:

1. physical contact with the waste, structures or equipment within the active portion of the facility will injure unknowing or unauthorized persons or livestock which may enter the active portion of a facility - 373-3.2(e)(1)(i) AND YES ___ NO ___

2. disturbance of the waste or equipment, by the unknowing or unauthorized entry of persons or livestock onto the active portion of a facility, will cause a violation of the requirements - YES ___ NO ___

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373-3.2(e)(1)(ii).

B. If yes is checked under A1 and A2 above, the facility must have the following:

1. ___ A 24-hour surveillance system which continuously monitors ___ and controls entry onto the active portion of the facility - 373-3.2(e)(2)(i) OR
2. ___ An artificial or natural barrier which completely ___ surrounds the active portion of the facility - 373-3.2(e)(2)(iii)(a); AND
3. ___ A means to control entry, at all times, through the gates ___ or other entrances to the active portion of the facility - 373-3.2(e)(2)(ii)(b).
4. ___ A sign with the legend, "Danger - Unauthorized Personnel Keep Out" posted at each entrance to ___ the active portion of the facility, and at other locations, in sufficient numbers to be seen from any approach to the active portion (not needed if owner or operator is exempt under A1 and A2 above) - 373-3.2(e)(3).

5. General Inspection Requirements - 373-3.2(f)

- A. ___ The owner or operator has inspected the facility ___ for malfunctions and deterioration, operator errors, and discharges which may be causing or may lead to release of hazardous waste constituents to the environment, or a threat to human health hazards - 373-3.2(f)(1).
- B. 1. ___ The owner or operator has developed and followed a ___ written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment (such as dikes and sump pumps) that are important to preventing, detecting, or responding to environmental or human health hazards - 373-3.2(f)(2)(i).
2. ___ The written inspection schedule is kept at the ___ facility - 373-3.2(f)(2)(ii).
3. ___ The schedule identifies the type of problems which are to ___ be looked for during the inspection - 373-3.2(f)(2)(iii).
4. ___ The frequency of inspection is based on the rate ___ of possible deterioration of the equipment and the probability of an environmental or human health incident, if the deterioration, or malfunction, or any operator error goes undetected between inspections. Areas subject to spills, such as loading and unloading areas, must be inspected daily when in use. At a minimum, the inspection schedule must include the items and frequencies called for in other sections of Part 373-3 dealing with treatment, storage and disposal activities - 373-3.2(f)(2)(iv).

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- C. ___ The owner or operator has remediated any deterioration or malfunction of equipment or structures which the inspection has revealed - 373-3.2(f)(3). ___
- D. ___ The owner or operator has recorded inspections in an inspection log or summary - 373-3.2(f)(4). ___
- E. ___ The inspection log or summary has been kept for at least three years from the date of inspection - 373-3.2(f)(4). ___
- F. ___ The records, at a minimum, include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or remedial actions - 373-3.2(f)(4). ___
6. Container Storage Requirements - Complete Part V, Items 3(c) thru 3(j). (pgs. V-2 and V-3), as applicable.
7. Personnel Training - Complete Part V, Item 6 (pgs. V-7 and V-8).
8. Preparedness and Prevention - Complete Part V, Item 7 (pgs. V-8 through V-10).
9. Contingency Plan and Emergency Procedures - Complete Part V, Items 8 and 9 (pgs. V-10 through V-12).
10. Manifest, Recordkeeping and Reporting - Complete Part V, Item 5 (pgs. V-5 through V-7). NOTE: These questions apply only to TSD's that ship hazardous waste off-site.
11. Operating Record - 373-3.5(c)
- A. ___ The owner or operator has kept a written operating record at his facility - 373-3.5(c)(1). ___
- B. ___ The following information is included in the operating record, as it becomes available, and maintained in the operating record until closure of the facility - 373-3.5(c)(2):
1. ___ A description and the quantity of each hazardous waste received, and the method(s) and date(s) of its treatment, storage or disposal at the facility - 373-3.5(c)(2)(i); ___
2. ___ The location of each hazardous waste within the facility and the quantity at each location - 373-3.5(c)(2)(ii); ___
3. ___ (For disposal facilities). The location and quantity of each hazardous waste must be recorded on a map or diagram of each cell or disposal area - 373-3.5(c)(2)(ii); ___
4. ___ Information must include cross references to specific manifest document numbers, if the waste was accompanied by a manifest - 373-3.5(c)(2)(ii); ___
5. ___ Records and results of waste analyses, waste determinations and trial tests performed -373-3.5(c)(2)(iii); ___

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6. ___ Summary reports and details of all incidents that require implementing the contingency plan - 373-3.5(c)(2)(iv); ___
7. ___ Records and results of inspections as required by 373-3.2(f) - 373-3.5(c)(2)(v); ___
8. ___ Monitoring, testing or analytical data and corrective action where required - 373-3.5(c)(2)(vi); ___
9. ___ All closure cost estimates. (Does not apply to generators over sole source aquifer and State or Federal facilities) - 373-3.5(c)(2)(vii); ___
10. ___ (For disposal facilities). All post-closure cost estimates - 373-3.5(c)(2)(vii); ___
11. ___ Records of the quantities (and date of placement) for each shipment of hazardous waste placed in land disposal units under an extension to the effective date of any land disposal restriction granted by the Commissioner - 373-3.5(c)(2)(viii); ___
12. ___ Monitoring data required pursuant to a petition; 373-3.5(c)(2)(viii); ___
13. ___ The applicable notice required by a generator under 376.1(g), [waste analysis and recordkeeping] - 373-3.5(c)(2)(viii); ___
14. ___ For an off-site treatment facility, a copy of the notice, and the certification and demonstration if applicable, required by the generator or the owner or operator under 376.1(g) - 373-3.5(c)(2)(ix); ___
15. ___ For an on-site treatment facility, the information contained in the notice (except the manifest number), and the certification and demonstration if applicable, required by the generator or the owner or operator under 376.1(g) - 373-3.5(c)(2)(x); ___
16. ___ For an off-site land disposal facility, a copy of the notice, and the certification and demonstration, if applicable, required by the generator or the owner or operator of a treatment facility under 376.1(g) - 373-3.5(c)(2)(xi); ___
17. ___ For an on-site land disposal facility, the information contained in the notice (except the manifest number), and the certification and demonstration if applicable, required by the generator or the owner or operator of a treatment facility under 376.1(g) - 373-3.5(c)(2)(xii); ___
18. ___ For an off-site storage facility, a copy of the notice and the certification and demonstration if applicable, required by the generator or the owner or operator under 376.1(g) - 373-3.5(c)(2)(xiii); and ___

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19. ___ For an on-site storage facility, the information ___
contained in the notice (except the manifest number),
and the certification and demonstration if applicable, required
by the generator or the owner or operator of a treatment
facility under 376.1(g) - 373-3.5(c)(2)(xiv).
12. Manifest - 373-3.5(b) (NOTE: This section applies only to TSD operations
that receive hazardous waste from off-site.)
- A. Upon receipt of manifested shipment of hazardous waste the
owner or operator:
1. ___ checked for significant discrepancies in quantities ___
from those stated on the manifest - 373-3.5(b)(1)(i)(a).
2. ___ determined that all portions of the manifest have ___
been completed - 373-3.5(b)(1)(i)(b).
3. ___ distributed copies of the manifest according to the ___
instructions with the manifest form - 373-3.5(b)(1)(iv).
- B. Upon receipt of an unmanifested shipment of hazardous waste
the owner or operator:
1. ___ determined the reason why the shipment was not ___
accompanied by a manifest - 373-3.5(b)(2)(i).
2. ___ filed an unmanifested waste report after accepting ___
the waste transported by a rail or water transporter
and manifest is not received within seven days of
the shipment - 373-3.5(b)(2)(iii).
- C. ___ Facility accepted a particular hazardous waste without ___
an authorized permit to do so - 373-3.5(b)(5)(i).
- D. ___ Facility accepted a hazardous waste without having adequate ___
treatment, storage or disposal capacity available -
373-3.5(b)(5)(ii).
13. Availability, Retention and Disposition of Records
- A. ___ All records, including plans, required under Part 373-3 ___
are kept at the facility and furnished upon request, and
made available at all reasonable times for inspection -
373-3.5(d)(1).
- B. ___ All reports and records required under subdivision ___
373-3.5(b)(3) were retained for three years from the
date of submittal - 373-3.5(b)(3)(iii)(a).
- C. ___ Upon closure of the facility, a copy of records of waste ___
disposal locations and quantities was submitted to the Commissioner
and local Land Authority - 373-3.5(d)(3).
14. Additional Reports
- A. ___ A TSDF Annual Report has been submitted to the Department ___

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by March 1 of each year - 373-3.5(e).

- B. ___ Releases, fires and explosions as specified in paragraph 373-3.4(g)(10) - 373-3.5(g)(1). ___
- C. ___ Groundwater contamination and monitoring data as specified in subdivisions 373-3.6(d) and 373-3.6(e) - 373-3.5(g)(2). ___
- D. ___ Facility closure as specified in subdivision 373-3.7(f) - 373-3.5(g)(3). ___
- E. ___ Any other reports required by section 373-3.27, 373-3.28 and 373-3.29 (Subpart AA, BB & CC) - 373-3.5(g)(4). ___

15. Groundwater Monitoring - 373-3.6

- ___ A groundwater monitoring program is required for surface impoundments, landfills, or land treatment facilities and has been implemented - 373-3.6(a)(1). ___

GROUNDWATER MONITORING INSPECTION FORM
WILL BE COMPLETED BY GEOLOGIST

16. Closure and Post-Closure - 373-3.7

- A. ___ The owner or operator has a written closure plan. Until final closure is completed and certified, a copy of the most current plan must be furnished to the Commissioner upon request. In addition, for facilities without approved plans it must be provided during site inspections, on the day of inspection, to any authorized Department representative - 373-3.7(c)(1). ___
- B. ___ The owner or operator must amend the closure plan whenever changes in operating plans or facility design affect the closure plan, there is a change in the expected year of closure, or in conducting partial or final closure activities, unexpected events require a modification of the closure plan - 373-3.7(c)(3)(i). ___
- C. ___ The owner or operator of a hazardous waste disposal unit must have a written post-closure plan - 373-3.7(h)(1). ___
- D. ___ Within 60 days of completion of final closure of the facility or within 60 days of a partial closure of any hazardous waste management unit, the owner or operator has submitted to the Commissioner, by registered mail, a certification that the unit or facility, as applicable, has been closed in accordance with the specifications in the approved closure plan. The certification has been signed by the owner or operator and by an independent professional engineer registered in NYS - 373.3.7(f)(1). ___

17. Financial Requirements - 373-3.8 (Generators over a sole source aquifer, and State and Federal Facilities are exempt).

Indicate:

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- A. ___ The owner or operator has a detailed written estimate of the cost of closing the facility. The estimate appears to equal the cost of closure at the point in the facility's operating life when the extent and manner of its operation would make closure the most expensive, as indicated by its closure plan. The closure cost are based on the costs of third party closure and do not incorporate any salvage values - 373-3.8(c)(1). ___
- B. ___ Within 60 days prior to the anniversary date of the establishment of the financial instruments used to provide financial assurance for facility closure, the owner or operator has adjusted the closure cost estimate for inflation. For owners and operators using the financial test or corporate guarantee, the closure cost estimate has been updated for inflation within 30 days after the close of the firm's fiscal year - 373-3.8(c)(2). ___
- C. ___ The closure cost estimate has subsequently been adjusted for each year of operation - 373-3.8(c)(2). ___
- D. ___ The owner or operator has revised the new closure cost estimate no later than 30 days after a revision to the closure plan affects the cost of closure - 373-3.8(c)(3). ___
- E. ___ The owner or operator has kept the first estimate, and all required subsequent estimates at the facility - 373-3.8(c)(4). ___
- F. ___ The owner or operator has established financial assurance for closure of the facility - 373-3.8(d). ___
- G. ___ The owner or operator of a facility or a group of facilities has demonstrated and maintained financial responsibility for bodily injury and property damage to third parties caused by sudden accidental occurrences arising from operations. This liability coverage is in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million - 373-3.8(h)(1). ___

(QUESTIONS H THROUGH J ARE FOR OWNERS AND OPERATORS OF DISPOSAL FACILITIES)

- H. ___ The owner or operator of a surface impoundment, landfill, or land treatment facility or a group of such facilities has demonstrated financial responsibility for bodily injury and property damage to third parties caused by nonsudden accidental occurrences arising from operations. This liability coverage is in the amount of at least \$4.5 million per occurrence with an annual aggregate of at least \$9 million for each separate facility in NYS - 373-3.8(h)(2). ___
- I. ___ The owner or operator of a hazardous waste disposal unit facility has a detailed written estimate of the annual costs of post-closure monitoring and maintenance of the facility - 373-3.8(e)(1). ___
- J. ___ During the active life of the facility, the owner or operator has adjusted the post-closure cost estimate within 60 days prior to the anniversary date of the ___

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X Violations

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NA Not Applicable

establishment of the financial instruments used to
provide financial assurance - 373-3.8(e)(2).

18. Tanks - 373-3.10
Complete Appendix E.